

John Morrison
Robert Farris-Olsen
MORRISON, SHERWOOD,
WILSON, & DEOLA, PLLP
401 N. Last Chance Gulch St.
Helena, MT 59601
ph. (406) 442-3261
fax (406) 443-7294
john@mswdlaw.com
rfolsen@mswdlaw.com
Attorneys for Plaintiff Tanya Gersh

J. Richard Cohen*
David C. Dinielli*
Jim Knoepp*
Elizabeth Littrell*
SOUTHERN POVERTY LAW CENTER
400 Washington Avenue
Montgomery, AL 36104
ph. (334) 956-8200
fax (334) 956-8481
richard.cohen@splcenter.org
david.dinielli@splcenter.org
jim.knoepp@splcenter.org
beth.littrell@splcenter.org
Attorneys for Plaintiff Tanya Gersh
*Admitted *Pro Hac Vice*

UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
MISSOULA DIVISION

TANYA GERSH,

Plaintiff,

vs.

ANDREW ANGLIN, publisher of
the *Daily Stormer*,

Defendant.

Case No.: 9:17-cv-00050-DLC-JCL

**PLAINTIFF'S UNOPPOSED
MOTION TO ENTER PROTECTIVE
ORDER GOVERNING
"CONFIDENTIAL" AND "HIGHLY
CONFIDENTIAL" INFORMATION**

Plaintiff, TANYA GERSH, hereby moves this Court, pursuant to Fed. R. Civ. P. 26(c), for entry of the attached Protective Order governing "Confidential" and "Highly Confidential" information based on prior briefing. (Dkt. Nos. 132, 133, 136, 141). Defendant, through counsel, represented that he withdrew all

objections to Plaintiff's proposed Stipulated Protective Order, (Dkt. No. 136-3), following the Parties' negotiations on March 14 and 15, 2019

Pursuant to this Court's direction, (Dkt. No. 157, at 33:2-34:9), Plaintiff added two provisions to specifically address Ninth Circuit law regarding protective orders and circulated the revised versions to Defendant and Intervenor by email on March 21 and 22, 2019. Intervenor and Defendant responded that they do not object to the filing of this motion.

DATED March 22, 2019.

/s/ Elizabeth Littrell

On behalf of all attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this date the foregoing document was filed through the Court's CM/ECF filing system, and by virtue of this filing notice will be sent electronically to all counsel of record, including:

Mathew M. Stevenson
STEVENSON LAW OFFICE
1120 Kensington, Suite B
Missoula, Montana 59801
matstevenson@bigskylegal.com
Attorney for Defendant Andrew Anglin

Marc J. Randazza
RANDAZZA LEGAL GROUP, PLLC
2764 Lake Sahara Drive, Suite 109
Las Vegas, Nevada 89117
mjr@randazza.com; ecf@randazza.com
Attorney for Defendant Andrew Anglin

Jay M. Wolman
RANDAZZA LEGAL GROUP, PLLC
100 Pearl Street, 14th Floor
Hartford, Connecticut 06103
jmw@randazza.com; ecf@randazza.com
Attorney for Defendant Andrew Anglin

Dale M. Schowengerdt
MONTANA DEPARTMENT OF JUSTICE
215 North Sanders
PO Box 201401
Helena, MT 59620-1401
dales@mt.gov
Attorney for Intervenor State of Montana

Jonathan W. Bennion
MONTANA DEPARTMENT OF JUSTICE
215 North Sanders
PO Box 201401
Helena, MT 59620-1401
jonbennion@mt.gov
Attorney for Intervenor State of Montana

Matthew T. Cochenour
MONTANA DEPARTMENT OF JUSTICE
215 North Sanders
PO Box 201401
Helena, MT 59620-1401
mcochenour2@mt.gov
Attorney for Intervenor State of Montana

on this 22nd day of March, 2019.

/s/Elizabeth Littrell

Attorney for Plaintiff Tanya Gersh
on behalf of all Attorneys for Plaintiff